

1	Joshua Koltun (Bar No. 173040)				
2	One Sansome Street Suite 3500, No. 500				
3	San Francisco, California 94104				
4	Telephone: 415.680.3410 Facsimile: 866.462.5959				
	joshua@koltunattorney.com				
5	Attorney for Third Party Witnesses				
	Below the Blue, Marine Taxonomic Services, Ltd,				
7	Seth Jones, and Monique Rydel-Fortner				
8					
9	UNITED STATES DISTRICT COURT				
10	EASTERN DISTRICT OF CALIFORNIA				
11					
12					
13	CALIFORNIA SPORTFISHING	Case 2:21-cv-00073-JDP			
	PROTECTION ALLIANCE,	STIPULATION AND [PROPOSED]			
14	Plaintiff,	ORDER PERMITTING BELOW THE BLUE et al. TO JOIN			
15	v.	STIPULATED PROTECTIVE ORDER			
16	PACIFIC BELL TELEPHONE COMPANY	[D.E. 117]			
17					
18	Defendant				
19					
20					
21					
22					
23					
24					
25					
26					
27					
28					

1	Plaintiff California Sportfishing Protection Alliance ("CSPA") and Defendant Pacific Bell			
2	Telephone Company ("Pacific Bell") and Third Party Witnesses Below the Blue, Marine Taxonomic			
3	Services, Ltd, Seth Jones, and Monique Rydel-Fortner (hereinafter, "BTB/MTS") hereby stipulate and			
4	respectfully and jointly ask that the Court enter an order that BTB/MTS may join the Stipulated			
5	Protective Order ("SPO") entered in this case [DE 117]. In other words, notwithstanding paragraph			
6	29 of that SPO, BTB/MTS is to have both the rights and the obligations of a "Party" under the terms			
7	of the SPO concerning the designation of material as "Confidential."			
8	This stipulation and requested order is purely procedural; nothing herein shall be construed as			
9				
10	a waiver of any rights, nor as an admission, stipulation, or agreement that any information produced by			
11	BTB/MTS qualifies for confidential treatment under that Order.			
12				
13	Respectfully submitted,			
14	Dated: February 8, 2024 /s/Hariklia Karis			
15	Hariklia Karis KIRKLAND & ELLIS LLP			
16	Hariklia Karis (admitted pro hac vice)			
17	hkaris@kirkland.com			
18	Robert B. Ellis (admitted pro hac vice) rellis@kirkland.com			
	Mark J. Nomellini (admitted pro hac vice)			
19	mnomellini@kirkland.com KIRKLAND & ELLIS LLP			
20	300 North LaSalle			
21	Chicago, IL 60654			
22	Telephone: (312) 862-2000			
	Jon David Kelley (admitted pro hac vice)			
23	jon.kelley@kirkland.com KIRKLAND & ELLIS LLP			
24	4550 Travis Street			
25	Dallas, Texas 75205 Telephone: (214) 972-1770			
26				
27				

28

Case 2:21-cv-00073-JDP Document 126 Filed 02/09/24 Page 3 of 4

1		Navi Singh Dhillon (SBN 279537) navidhillon@paulhastings.com
2		Peter C. Meier (SBN 179019)
_		petermeier@paulhastings.com
3		Christopher J. Carr (SBN 184180)
4		lucasgrunbaum@paulhastings.com Lucas Grunbaum (SBN 314180)
		lucasgrunbaum@paulhastings.com
5		PAUL HASTINGS LLP
6		101 California Street, 48th Floor
7		San Francisco, California 94111
7		Telephone: (415) 856-7000
8		Attorneys for Defendant
9		PACIFIC BELL TELEPHONE COMPANY
	Detail Feb., 9, 2024	/-/M-441
10	Dated: February 8, 2024	/s/Matthew Maclear Matthew Maclear
11		AQUA TERRA AERIS LAW GROUP
		Matthew Maclear (State Bar No. 209228)
12		Email: mcm@atalawgroup.com
13		Jason Flanders (State Bar No. 238007)
14		Email: jrf@atalawgroup.com Erica A. Maharg (State Bar No. 279396)
14		Email: eam@atalawgroup.com
15		J. Thomas Brett (State Bar No. 315820)
16		Email: jtb@atalawgroup.com
10		AQUA TERRA AERIS LAW GROUP
17		4030 MARTIN LUTHER KING JR WAY OAKLAND, CA 94609
18		Tel: (415) 568-5200
19		Andrew L. Packard (SBN 168690)
20		andrew@packardlawoffices.com William N. Carlon (SBN 305739)
		wncarlon@packardlawoffices.com
21		LAW OFFICES OF ANDREW L. PACKARD
22		245 Kentucky Street, Suite B3
23		Petaluma, CA 94952
		Telephone: (707) 782-4060 Fax: (707) 782-4062
24		Tux. (101) 102 1002
25		
26		
27		
28		

Case 2:21-cv-00073-JDP Document 126 Filed 02/09/24 Page 4 of 4

	II		
1	William Verick (SBN 140972 wverick@igc.org)	
2	VI AMATH ENVIDONMEN	TAL	
3	3 1125 16th Street, Suite 204		
4	Arcata, CA 95521 Telephone: (707) 630-5061		
5	5 Fax: (707) 630-5064		
6	J. Kirk Boyd (SBN 122759)		
7		RK BOYD	
8	8 548 Market St., Suite 1300 San Francisco, CA 94104-540)1	
9	Telephone: (415) 440-2500		
10	CALIFORNIA SPORTFISHI	NG	
11	PROTECTION ALLIANCE		
12	2 Dated: February 8, 2024 /s/ Joshua Koltun		
13	Joshua Koltun		
14	Joshua Koltun (Bar No. 1730) One Sansome Street	40)	
15	Suite 3500, No. 500 San Francisco, California 94	104	
16	Telephone: 415.680.3410	104	
17	Facsimile: 866.462.5959 joshua@koltunattorney.com		
18	8 Attorney for Third Party Witn	esses	
19	Below the Blue,		
20	Marine Taxonomic Services,		
21	The filer of this document attests that all signatories listed above have concurred in the		
22			
23			
24	SOORDERED		
25	D 4 1 E 1 2024		
26			
27	Hon. Jeremy D. Peterson		
28	Office States Magistrate Judge		